

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

NECA-IBEW PENSION TRUST FUND and) Case No. 10-cv-00440 (LAK) (HBP)
DENIS MONTGOMERY, on Behalf of)
Themselves and All Others Similarly Situated,)

Plaintiffs,)

v.)

) CLASS ACTION

) ECF CASE

BANK OF AMERICA CORPORATION,)
KENNETH D. LEWIS, JOE L. PRICE,)
NEIL A. COTTY, WILLIAM BARNET, III,)
FRANK P. BRAMBLE, SR., JOHN T.)
COLLINS, GARY L. COUNTRYMAN,)
TOMMY R. FRANKS, CHARLES K.)
GIFFORD, W. STEVEN JONES, WALTER E.)
MASSEY, THOMAS J. MAY, PATRICIA E.)
MITCHELL, THOMAS M. RYAN, O.)
TEMPLE SLOAN, JR., MEREDITH R.)
SPANGLER, ROBERT L. TILLMAN, JACKIE)
M. WARD, BANC OF AMERICA)
SECURITIES LLC, CITIGROUP GLOBAL)
MARKETS INC., MERRILL LYNCH, PIERCE,)
FENNER & SMITH INCORPORATED,)
MORGAN STANLEY & CO.)
INCORPORATED, UBS SECURITIES LLC,)
WACHOVIA CAPITAL MARKETS, LLC,)
DEUTSCHE BANK SECURITIES, J.P.)
MORGAN SECURITIES INC.,)

Defendants.)

**LEAD PLAINTIFF'S NOTICE OF FILING PAPERS WITH THE
JUDICIAL PANEL OF MULTIDISTRICT LITIGATION**

PLEASE TAKE NOTICE that, on May 3, 2011 Defendant Countrywide Financial Corporation and its related defendant entities (collectively, the “Countrywide Defendants”), filed a Motion to Centralize Securities Actions in the Central District of California Pursuant to 28 U.S.C. §1407 with the Judicial Panel on Multidistrict Litigation. *In Re Countrywide Financial Corporation Securities Litigation Cases*, MDL Docket No. 2265. Pursuant to J.P.M.L. Rule 6.2(a), attached to this Notice are copies of Lead Plaintiff, NECA-IBEW Pension Trust Fund’s (“NECA-IBEW”), Motion and supporting documents, filed with the Judicial Panel on Multidistrict Litigation on June 8, 2011 to add the instant *Montgomery* action to the Countrywide Defendants’ pending Motion before the Multi-District Litigation Panel to centralize pending securities actions for coordinated and/or consolidated pretrial proceedings before the United States District Court for the Central District of California pursuant to 28 U.S.C. §1407(a).

Dated: June 8, 2011

FINKELSTEIN & KRINSK LLP

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